

TO: Mass Dept of Energy Resources
FROM: Andrew Baker
RE: Public Comment on Biomass Energy Production
DATE: 8/3/10

I am writing in response to your request for public comment on the development of regulations governing the energy production from biomass.

DOER should prioritize support for production facilities that have high greenhouse gas reduction benefits, operate at high efficiency, low pollution output, have low transportation impact on communities, and are appropriately scaled to use raw materials at a sustainable and renewable rate.

Production of biodiesel fuel from recycled vegetable oil and waste grease would meet these criteria.

Production of electricity from wood chips as proposed by the production facilities seeking permits to operate in Greenfield and Westfield do not meet these criteria and should neither be subsidized nor licensed in their current form. Licensing production plants at that scale and at the unconscionably low 25% efficiency rate for converting wood chip energy to electricity is a recipe for expansion from waste wood to whole trees, to clearcuts and eventual use of construction debris, with high risk of high pollution outputs. Plants operating at that scale will damage our forests and drive up the cost of firewood for home heating.

We should not subsidize corporations to waste 75% of the wood energy they are collecting.

If Massachusetts wishes to experiment with developing biomass energy at appropriate scale, and create practical demonstrations to test concerns about pollution, over-harvesting, etc. we should be licensing more facilities that burn waste wood for heat and possibly co-generation of electricity, such as the Cooley Dickinson Hospital wood heating plant.

Smaller production facilities that can convert wood chip energy to heat and electricity at an 80% efficiency rate are more worthy of development and support.

Subsidies and support for biomass electricity on the scale proposed should be withdrawn, much the way subsidies have been withdrawn for production of biodiesel from virgin soy oil. The science has shown both to be wasteful and inefficient enterprises that do not produce reductions in greenhouse gases.

Thanks for this opportunity to comment.

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